

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

v.

SILVIU CATALIN BALACI,

Defendants.

Case No. 19 Cr. 877-5 (CCC)

**DECLARATION IN SUPPORT OF MOTION FOR WITHDRAWAL**

I, Joseph Stern, declare as follows, pursuant to 28 U.S.C. § 1746:

1. Pursuant to Local Civil Rule 201.1 of the Local Rules of the United States District Court for the District of New Jersey, made applicable to criminal actions by Local Criminal Rule 1.1, I respectfully request leave of the Court to withdraw my individual appearance as counsel for Defendant Silviu Catalin Balaci in the above-captioned action.

2. As of October 20, 2023, I will no longer be associated with Morvillo Abramowitz Grand Iason & Anello P.C.

3. Robert J. Anello and Brian A. Jacobs of the law firm of Morvillo Abramowitz Grand Iason & Anello P.C. will remain as counsel of record to Mr. Balaci.

4. Because the motion herein will not result in a change of the law firm representing Mr. Balaci, I respectfully submit that my withdrawal as counsel of record will not affect this action in any way, will not alter the posture of the case, and will not prejudice any parties.

5. For the foregoing reasons, I hereby request that I be removed as counsel of record from the Electronic Case Filing system, and that no documents, notices, or other pleadings in the action be served upon me.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 19, 2023  
New York, New York

/s/ *Joseph Stern*  
Joseph Stern